IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,)
Plaintiff,) CIVIL ACTION NO. 1:16CV1172
v.))
UNION SAVINGS BANK GUARDIAN SAVINGS BANK, FSB,)))
Defendants.))
	<i>)</i>

JOINT MOTION TO TERMINATE THE CONSENT ORDER

The United States, Union Savings Bank and Guardian Savings Bank jointly move to terminate the Consent Order (ECF 4) in this matter pursuant to paragraph 45 of that Order. Paragraph 45 states:

If, at any time after three years from the Effective Date, the Banks have invested all money in the Loan Subsidy Program and satisfied their other financial obligations under the Order (set forth in Paragraphs 22, 29, and 30), the United States will agree to the Order terminating three months after the Banks have provided the United States with documentation evidencing that they have satisfied their financial obligations under this Order.

The effective date of the Consent Order was January 3, 2017. ECF 4. Thus, the Consent Order had been in effect for three years as of January 3, 2020. Union Savings Bank and Guardian Savings Bank have provided evidence to the United States that they satisfied all of their financial obligations under the Order. Absent a joint motion, the Consent Order is expected to expire upon Plaintiffs' non-objection to the Defendant's fifth Annual Report under paragraph 41 of the Consent Order, which is due on or about March 3, 2022. *See* ECF 4, ¶41 and ¶42. The

parties to this matter agree that early termination under paragraph 45 of the Consent Order is appropriate.

Respectfully submitted this 20th day of February, 2020.

For the United States:

DAVID M. DEVILLERS United States Attorney Southern District of Ohio ERIC S. DREIBAND Assistant Attorney General Civil Rights Division

SAMEENA SHINA MAJEED Chief, Housing and Civil Enforcement Section Civil Rights Division

/s/ Matthew Horwitz

MATTHEW HORWITZ (0082381)
Assistant United States Attorney
Southern District of Ohio
221 E. Fourth Street, Suite 400
Cincinnati, Ohio 45202
Tel.: (513) 684-3711
Matthew.Horwitz@usdoj.gov

/s/ Sara L. Niles

JON SEWARD
First Deputy Chief
SARA L. NILES
Trial Attorney
United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
150 M Street, NE
Washington, DC 20530

Tel.: (202) 514-2168 Sara.Niles@usdoj.gov

For Union Savings Bank and Guardian Savings Bank:

/s/ Lisa M. Krigsten

LISA M. KRIGSTEN
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, Missouri 64111
Tel.: (816) 460-2554
Lisa.Krigsten@dentons.com

/s/ Ralph W. Kohnen

RALPH W. KOHNEN (0034418) Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800 Cincinnati, OH 45202 Tel: (513) 357-9618 Kohnen@taftlaw.com